

## REMARKS

Applicants and Applicants' attorney wish to express their gratitude to Examiner Haugland and Examiner Matecki for the courtesy and assistance they provided during the personal interview on June 21, 2005. As stated on the Examiner Interview Summary Record, Morizzo and Kammann were discussed in detail with respect to the currently pending claims and with respect to various dependent claims and other features contained in the present specification.

Based upon the input provided by the Examiners, Applicants have decided to amend all of the independent claims in the present application. For instance, claim 1 is directed to a winder for winding a web to produce a rolled product. The claim requires a web transport apparatus for conveying a web and a plurality of independent winding modules that are independently positioned to independently engage the web as the web is conveyed by the web transport apparatus. As now amended, claim 1 further requires that winding of the web by combinations of center and surface winding includes pressing the winding modules towards the web transport apparatus at a controllable magnitude to create a nip pressure to control winding of the web. Support for this claim amendment can be found in at least the first full paragraph on page 9 of Applicants' application.

As now amended, it is believed that all of the claims patentably define over Kammann, Morizzo, and/or Johnson in any proper combination. Further, it is believed that the claims also patentably define over the other secondary references cited in the Office Action, including Pretto, Dowd, Urban and Little.

For example, as admitted in the Office Action, Morizzo does not disclose a

winder that is configured to form a rolled product by center winding, by surface winding, and by combinations of center and surface winding. For these features, Kammann was combined with Morizzo. Kammann discloses a device for winding a web that can be operated in two modes. The first mode is described as central contact winding and the second mode is described as central gap winding. In comparison to the currently pending claims, however, Kammann does not disclose or suggest pressing a winding module towards a web transport apparatus at a controllable magnitude to create a nip pressure to control winding of the web. Further, as discussed above, this feature is not disclosed in any of the remaining prior art references as well. As such, it is believed that the currently pending claims patentably define over the references cited in the previous Office Action.

In the Office Action of March 24, 2005, claims 1-36, 59 and 61-69 were also rejected under 35 U.S.C. § 112, first paragraph, for reciting that the web is fed continuously to the web transport apparatus. Applicants respectfully submit that support for this recitation is found in the sections of Applicants' application noted in Applicants' Amendment mailed February 14, 2005. However, for the sole purpose of advancing prosecution in the present application, Applicants have removed the recitation of the web being fed continuously to the web transport apparatus in claims 1, 31, 34, 61, 62, 63, 64, 65 and 66.

Also, in the Office Action of March 24, 2005, claims 37-59, 68 and 70 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter regarded as the invention. Specifically, claim 59 was objected to for calling for the center winding means, surface

winding means, and combination center and surface winding means to be separate elements. In regards to this objection, Applicants rely on Applicants previously submitted statements of February 14, 2005. However, for the sole purpose of advancing prosecution in the present case, Applicants have cancelled claim 59 in order to render the rejection to this claim moot.

The Office Action of March 24, 2005 stated that claims 37 and 38 were inaccurate because the rolled product is formed on and is supported by the mandrels and, therefore, rotates with the mandrels during winding. Applicants have amended claims 37 and 38 in order to avoid any possible confusion in this regard. Specifically, claims 37 and 38 call for mandrels that are rotated by the winding modules so that rotation of the mandrels is caused by only the winding modules during center winding. This type of winding is distinguished, for instance, from surface winding in which the mandrels may be driven in part through a rotation of the surface onto which the mandrel is urged against, for instance the web transport apparatus. Claims 37 and 38 do not call for the mandrels to be rotated during center winding while the rolled product is not rotated. Claims 37 and 38 have been clarified in order to make clear that the winding of the mandrels is caused only by the winding modules during center winding and is not caused by contact of the rolled product on the mandrels with another element, such as the web transport apparatus. As such, Applicants respectfully submit that claims 37 and 38 do not suffer from any § 112, second paragraph deficiencies.

The Office Action also stated that claim 68 was unclear in that the claim seeks to compare a rate of winding with a rate of core loading or product stripping. Applicants have amended claim 68 so as to remove the comparison between rates of these

processes. Specifically, claim 68 now calls for a winder in which the winding modules are configured to wind the web at the same time as cores are loaded onto another winding module. Additionally, claim 68 calls for the winding modules to be configured to wind web at the same time as product is stripped from another winding module. As such, a comparison of rates is no longer present in claim 68 and Applicants respectfully submit that this claim does not suffer from any § 112, second paragraph deficiencies.

In summary, it is believed that the currently pending claims are in complete condition for allowance. Should any questions or issues remain after consideration of this Amendment, however, then Examiner Haugland is invited and encouraged to telephone the undersigned at his convenience.

Respectfully submitted,

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